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*Counsel for Individual and Representative
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, Sarah Silverman, Christopher
Golden, Michael Chabon, Ta-Nehisi Coates, Junot
Díaz, Andrew Sean Greer, David Henry Hwang,
Matthew Klam, Laura Lippman, Rachel Louise
Snyder, Ayelet Waldman, and Jacqueline Woodson,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc., a Delaware corporation;

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' MOTION TO REMOVE
INCORRECTLY FILED DOCUMENT**

On December 11, 2023, Plaintiffs filed their First Consolidated Amended Complaint (ECF No. 64) (“FCAC”). On December 20, 2023, Defendant Meta Platforms, Inc. (“Meta”) informed Plaintiffs that it believed certain paragraphs of the FCAC contained information it contends is protected by the attorney-client privilege that was inadvertently disclosed without authorization by Meta. Although Plaintiffs disagreed with Meta that the relevant portions of the FCAC contained privileged material and that any privilege if it applied had been waived, the Parties mutually agreed that the relevant portions of the FCAC should be redacted pending the dispute’s resolution. Plaintiffs requested that the ECF Help Desk temporarily “lock” ECF No. 64 while the present motion is pending.

The Parties are concurrently filing a Joint Administrative Motion To Consider Whether Material Should Be Filed Under Seal that sets forth applicable authority and support for maintaining the identified information under seal along with a public redacted version of the First Consolidated Amended Complaint. Plaintiffs now respectfully request that the Court remove the previously filed First Consolidated Amended Complaint (ECF No. 64) permanently from the Court’s public docket and ECF system and the later-filed version of the document should be treated as the operative version.

Dated: December 22, 2023

By: /s/ Joseph R. Saveri
Joseph R. Saveri

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